

POLICY BULLETIN CHILD NUTRITION PROGRAMS

NSLP 19-08

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**SUBJECT: Cooperation with Federal Communications Commission's
(FCC) E-Rate Audits**

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The FCC, through the Universal Service Administrative Company (USAC), administers the E-Rate program. USAC provides discounts to schools to obtain affordable telecommunication and Internet access; the discount rates are based on the percentage of children who are approved for free and reduced price school meals. USAC has contracted with private firms to conduct audits of the discount rates given to schools. Specifically, auditors will ask for a list of students eligible for free or reduced price meals under the National School Lunch Program (NSLP) who enrolled in the selected schools along with the applications for those students.

The release of information to their auditors is permitted under section 9(b)(6) of the Richard B. Russell National School Lunch Act (NSLA). That section allows release of certain student eligibility information to Federal education programs.

As long as audit protocols are followed, Local Educational Agencies (LEAs) may share individual children's information with authorized FCC auditors. The applicable protocols are to:

- compare aggregate enrollment data with aggregate free and reduced price eligibility data;
- for a small sample of eligible students, request their applications (which could include direct certification records);
- confirm that an application or other documentation exists for each selected student; and
- prohibit auditors from retaining personal student information

Refer to Appendix C of the Eligibility Manual For School Meals for a prototype disclosure of free and reduced price information agreement.